

# **Exhibit 2**

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS**

ANDREW CORZO, SIA HENRY, ALEXANDER LEO-  
GUERRA, MICHAEL MAERLENDER, BRANDON  
PIYEVSKY, BENJAMIN SHUMATE, BRITTANY  
TATIANA WEAVER, and CAMERON WILLIAMS,  
individually and on behalf of all others similarly situated,

Plaintiffs,

v.

BROWN UNIVERSITY, CALIFORNIA INSTITUTE OF  
TECHNOLOGY, UNIVERSITY OF CHICAGO, THE  
TRUSTEES OF COLUMBIA UNIVERSITY IN THE CITY  
OF NEW YORK, CORNELL UNIVERSITY, TRUSTEES  
OF DARTMOUTH COLLEGE, DUKE UNIVERSITY,  
EMORY UNIVERSITY, GEORGETOWN UNIVERSITY,  
THE JOHNS HOPKINS UNIVERSITY,  
MASSACHUSETTS INSTITUTE OF TECHNOLOGY,  
NORTHWESTERN UNIVERSITY, UNIVERSITY OF  
NOTRE DAME DU LAC, THE TRUSTEES OF THE  
UNIVERSITY OF PENNSYLVANIA, WILLIAM MARSH  
RICE UNIVERSITY, VANDERBILT UNIVERSITY, and  
YALE UNIVERSITY,

Defendants.

**Case No. 1:22-cv-00125**

**Hon. Matthew F. Kennelly**

**DECLARATION OF ROBERT D. GILBERT IN SUPPORT OF  
PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES  
AND LITIGATION EXPENSES**

I, Robert D. Gilbert, declare as follows:

1. I am Managing Partner of Gilbert Litigators & Counselors, P.C. ("GLC") I submit this declaration in support of Plaintiffs' motion for an award of attorneys' fees and litigation expenses in connection with the services rendered, and costs and expenses incurred by GLC, in *Andrew Corzo, Sia Henry, et al., v. Brown University, et al.* (the "Action"). I am fully familiar with this Action, and have personal knowledge of the matters in this declaration and its Exhibits.

2. GLC serves as one of the counsel for Plaintiffs and the proposed Settlement Class in the Action, and has been appointed as one of the three Settlement Class Counsel, along with Freedman Normand Friedland LLP (“FNF”) and Berger Montague P.C. (“BMPC”). *See* ECF Nos. 439, 614, 638 (appointing Settlement Class Counsel). I personally have been engaged in overseeing the work conducted by Gilbert Litigators & Counselors in this matter. The schedule attached as Exhibit A is a true and correct summary identifying the attorneys and paralegal at GLC who have worked on this litigation, GLC’s total hours and lodestar, by year at historical rates from inception of the case through and including March 31, 2024. The total number of hours spent by GLC during this period was 36,232.3, with a corresponding total lodestar calculated at historical rates of \$31,368,140. Exhibit A also sets forth GLC’s total hours and lodestar using a blended hourly<sup>1</sup> rate for each attorney and professional staff for the period from inception of the case through and including March 31, 2024. This schedule was based upon contemporaneous, daily time records prepared and maintained by GLC.

3. As was stated in the February 9, 2022 “Declaration of Robert D. Gilbert in Support of Motion to Appoint Interim Co-Lead Class Counsel”, “I have assembled the ... co-lead counsel team with an extraordinary breadth and depth legal, subject matter, antitrust, class action, and Seventh Circuit expertise....” (¶3) In connection with representing the Plaintiffs in the Action, GLC spent enormous time and effort litigating this case, including the following:

- Extensive pre-filing investigation of Defendants’ anticompetitive conduct and violation of the 568 Exemption, and consultation with an economist;
- Research and analysis of legislative history;

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<sup>1</sup> A “blended rate” is the weighted average of each professional’s hourly rate over the course of the entire case. For instance, if a lawyer who worked only during 2 years of the case billed 500 hours during year 1 of the case at a rate of \$300/hour and 1000 hours during year 2 of the case at \$310/hour, the blended hourly rate would be (500 hours x \$300/hour) plus (1000 hours x \$310/hour) divided by 1500 hours for a blended hourly rate of \$306.67/hour.

- Legal research under Seventh Circuit law regarding joint and several liability issues, statute of limitations issues, the law of conspiracy, class certification, and potential defenses;
- Legal research regarding the U.S. Justice Department litigation against the Overlap Group in the 1990s;
- In collaboration with FNF and BMPC, drafting and filing the initial class action complaint as well as the amended complaint and the second amended complaint on behalf of the Plaintiffs;
- Drafting the brief in opposition to Defendants' motion to dismiss and, in collaboration with FNF and BMPC, editing and finalizing the brief;
- In collaboration with FNF and BMPC, propounding document demands and interrogatories;
- In collaboration with FNF and BMPC, drafting the initial Rule 26(f) report and case management order and the ensuing negotiations with Defendants on both;
- In collaboration with FNF and BMPC, negotiating and drafting, a proposed Confidentiality Order and its two subsequent amendments;
- Together with FNF and BMPC, drafting multiple additional Joint Status Reports for the Court and conducting negotiations with Defendants on all of those reports;
- Participating in weekly joint video conferences with the other Settlement Counsel to discuss overall litigation strategy, including the best ways to conduct discovery, which encompassed discussing key documents and testimony, organizing the factual record for litigation purposes, assigning responsibility for preparation of motions and briefs, coordinating the strategy as to 17 different defendants, and making sure that

- necessary tasks are completed in a timely manner;
- Organizing, reviewing, and analyzing voluminous documents produced by Defendants and third parties for use (a) in depositions of Defendants, (b) by Plaintiffs' economists, and (c) for purposes of mediation and settlement negotiations;
  - Analyzing the requirements of the Family Educational Rights and Privacy Act ("FERPA"), and drafting and finalizing multiple briefs on those issues, and representing Plaintiffs in several oral arguments on those issues;
  - Participating in negotiating Defendants' Responses to Plaintiffs' Interrogatories over the course of multiple meet-and-confers and through the exchange of multiple rounds of correspondence;
  - Drafting, and in conjunction with FNF and BMPC editing, and ultimately arguing in Court, multiple motions to compel;
  - Preparing for fact depositions in this case by (a) identifying key documents to be used at each deposition, (b) preparing extensive deposition outlines, and (c) and coordinating deposition strategy;
  - Taking 23 fact depositions, including:

<b>Witness</b>	<b>Affiliation</b>	<b>Date</b>	<b>Primary Firm Attorney</b>	<b>Other Plaintiff Attorneys Present</b>
James Tilton	Brown University Former Head of Financial Aid	5/15/23	Gilbert: R. Gilbert	Gilbert: S. Magnusson
Melissa Costanzi	Georgetown U., Senior Associate Director of Admissions	6/29/23	Gilbert; R. Gilbert	Gilbert: S. Magnusson
John McLaughlin	University of Pennsylvania Director of Admissions	7/12/23	Gilbert: R. Raymar	Gilbert: S. Schuster
Brent Tener	Vanderbilt U. Director, Student Financial Aid and Scholarships	7/12/23	Gilbert: R. Gilbert	Gilbert: S. Magnusson
Martin Schapiro	Northwestern U. Former President	7/18/23	Gilbert: R. Gilbert	Berger: H. Brinn
Elaine Varas	University of Pennsylvania Financial Aid	8/2/23	Gilbert: R. Raymar	Gilbert: S. Magnusson
John Gaines	Vanderbilt U. Director of Undergraduate Admissions	8/3/23	Gilbert: R. Gilbert	Gilbert: D. Copeland

<b>Witness</b>	<b>Affiliation</b>	<b>Date</b>	<b>Primary Firm Attorney</b>	<b>Other Plaintiff Attorneys Present</b>
Kathryn Tuman	Columbia U. Senior Financial Aid Specialist	9/8/23	Gilbert: E. Villarreal	Gilbert: F. Melgar
Michael Hall	Columbia U. Executive Director Financial Aid	9/13/23	Gilbert: E. Villarreal	Gilbert: N. Zaslove
Jessica Marinaccio	Columbia U. Dean of Admissions and Financial Aid	9/18/23	Gilbert: E. Villarreal	Gilbert: N. Zaslove
Christopher Watson	Northwestern U. AVP for Student Outreach and Dean of Undergraduate Enrollment	10/10/23	Gilbert: R. Gilbert	Berger: H. Brinn
Sarah Harberson	University of Pennsylvania Admissions	10/25/23	Gilbert: R. Raymar	Gilbert: N. Zaslove
Valeria Youmans	Georgetown U., Admissions - Executive Assistant	11/7/23	Gilbert: R. Gilbert	Gilbert: S. Magnusson
Charles Deacon	Georgetown U., Dean of Admissions	11/9/23	Gilbert: R. Gilbert	Gilbert: D. Copeland
Douglas Christiansen	Vanderbilt U., Dean of Financial Aid and Admissions	Nov. 30 interview; Dec. 1 deposition	Gilbert: R. Gilbert	Gilbert: D. Copeland
Melissa Costanzi	Georgetown U., Senior Associate Director of Admissions	1/25/24	Gilbert: R. Gilbert	Gilbert: S. Magnusson
Andrew Koenig	Georgetown U. Assistant to the President for Admissions and Special Programs	2/13/24	Gilbert: R. Gilbert	Gilbert: S. Magnusson
John DeGioia	Georgetown, U. President	2/16/24	Gilbert: R. Gilbert	Gilbert: S. Magnusson
Elaine Varas	University of Pennsylvania, Director of Financial Aid	3/18/24	Gilbert: R. Raymar	Gilbert: N. Zaslove
Eric Furda	University of Pennsylvania, Dean of Admissions	3/26/24	Gilbert: R. Raymar	Gilbert: R. Niyogi
John Zeller	University of Pennsylvania, Former Senior Vice President of Development and Alumni Relations	3/28/24	Gilbert: R. Raymar	Gilbert: R. Niyogi
R. Bartley Moore	Georgetown U., Vice President for Advancement	3/29/24	Gilbert: R. Gilbert	Gilbert: S. Magnusson
John DeGioia	Georgetown U. President	4/1/24	Gilbert: R. Gilbert	Gilbert: S. Magnusson

- In addition, GLC provided support to our co-counsel on the following 7 depositions:

<b>Witness</b>	<b>Affiliation</b>	<b>Date</b>	<b>Primary Firm Attorney</b>	<b>Other Plaintiff Attorneys Present</b>
Matt Lewis	Georgetown U. Assistant Dean of Financial Aid	10/27/23	BMPC: D. Walker	Gilbert: S. Magnusson
Eric Furda	University of Pennsylvania Former Dean of Admissions	11/16/23	FNF: T. Normand	Gilbert: N. Zaslove
Joel Carstens	University of Pennsylvania Former Director of Financial Aid	11/21/23	FNF: R. Cipolla	Gilbert: N. Zaslove
Patricia McWade	Georgetown U., Dean of Student Financial Services	12/8/2023	BMPC: E. Noteware	Gilbert: S. Magnusson
Matt Sessa	University of Pennsylvania, Associate Vice President, Student Registration & Financial Services	12/15/23	FNF: R. Cipolla	Gilbert: N. Zaslove
Jeffrey Gall	Georgetown U., Associate Dean of Financial Aid	1/19/24	BMPC: E. Noteware	Gilbert: S. Magnusson
Brent Tener	Vanderbilt U., Assistant Provost and Executive Director of Student Financial Aid and Scholarships	2/23/24	BMPC: R. Litan	Gilbert: D. Copeland

- Defending the deposition of Brittany Tatiana Weaver, a Plaintiff, on November 14, 2023;
- Drafting and editing motions to compel discovery and oral arguments on those motions;
- Preparation of an extensive mediation memorandum on all key points of facts and law, participating in the mediations before the Hon. Layn Phillips of Phillips ADR and the subsequent settlement negotiations, with the assistance of Miles N. Ruthberg, Esq. and Clay Cogman, Esq. of Phillips ADR, which included numerous telephonic and email discussions encompassing all the key settlement terms and conditions, including, inter



alia, Settlement Fund amount, the details of additional discovery to be taken of settling Defendants, and the scope of the release. The negotiations lasted weeks and were followed by weeks of detailed discussions and bank-and-forth negotiations over the precise language of the Settlement Agreement; and

- Participating in direct settlement negotiations with multiple Defendants, which also included preparation of memos on the salient points, numerous telephonic and email discussions encompassing all the key settlement terms and conditions, including, inter alia, Settlement Fund amount, the details of additional discovery to be taken of settling Defendants, and the scope of the release.

4. The lodestar amount reflected in Exhibit A is for work performed by attorneys and professional staff at GLC for the benefit of the Settlement Classes. The historical hourly rates for the attorneys and professional staff in GLC reflected in Exhibit A are the usual and customary hourly rates used by GLC. GLC's work on this case was performed on a contingent basis.

5. GLC has expended a total of \$1,007,669 in costs and expenses, including contributions to the litigation fund, in connection with the prosecution of the Action from inception of the case through and including March 31, 2024. These costs are set forth in the Schedule attached as Exhibit B and are reflected on the books and records of GLC. They were incurred on behalf of the Plaintiffs by GLC.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: Henderson, Nevada  
April 29, 2024

/s/Robert D. Gilbert  
Robert D. Gilbert

# **EXHIBIT A**

**Reported Total Hours and Historical Rate Lodestar  
Inception through March 2024**

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS**

ANDREW CORZO, SIA HENRY, ALEXANDER LEO-  
GUERRA, MICHAEL MAERLENDER, BRANDON  
PIYEVSKY, BENJAMIN SHUMATE, BRITTANY  
TATIANA WEAVER, and CAMERON WILLIAMS,  
individually and on behalf of all others similarly situated,

Plaintiffs,

v.

BROWN UNIVERSITY, CALIFORNIA INSTITUTE OF  
TECHNOLOGY, UNIVERSITY OF CHICAGO, THE  
TRUSTEES OF COLUMBIA UNIVERSITY IN THE CITY  
OF NEW YORK, CORNELL UNIVERSITY, TRUSTEES  
OF DARTMOUTH COLLEGE, DUKE UNIVERSITY,  
EMORY UNIVERSITY, GEORGETOWN UNIVERSITY,  
THE JOHNS HOPKINS UNIVERSITY,  
MASSACHUSETTS INSTITUTE OF TECHNOLOGY,  
NORTHWESTERN UNIVERSITY, UNIVERSITY OF  
NOTRE DAME DU LAC, THE TRUSTEES OF THE  
UNIVERSITY OF PENNSYLVANIA, WILLIAM MARSH  
RICE UNIVERSITY, VANDERBILT UNIVERSITY, and  
YALE UNIVERSITY,

Defendants.

**Case No. 1:22-cv-00125**

**Hon. Matthew F. Kennelly**

**EXHIBIT A TO THE DECLARATION OF ROBERT D.  
GILBERT IN SUPPORT OF PLAINTIFFS' MOTION  
FOR AN AWARD OF ATTORNEYS' FEES AND  
LITIGATION EXPENSES**

**Reported Total Hours and Historical Rate Lodestar  
Inception through March 2024**

Name	Position	Law School	Bar Admission	Year	Hours	Rate	Lodestar
Robert D. Gilbert	MP	Yale	1982	2021 and earlier	791.3	\$1,400	\$1,107,820
Robert D. Gilbert	MP	Yale	1982	2022	2,608.7	\$1,400	\$3,652,180
Robert D. Gilbert	MP	Yale	1982	2023	2,935.5	\$1,485	\$4,359,218
Robert D. Gilbert	MP	Yale	1982	1/24-3/24	625.7	\$1,495	\$935,422
Epidio Villarreal	P	Yale	1985	2021	19.6	\$1,400	\$27,440
Epidio Villarreal	P	Yale	1985	2022	417.8	\$1,400	\$584,920
Epidio Villarreal	P	Yale	1985	2023	870.3	\$1,485	\$1,292,396
Epidio Villarreal	P	Yale	1985	1/24-3/24	67.9	\$1,495	\$101,511
Robert S. Raymar	SC	Yale	1972	2021	55.2	\$1,300	\$71,760
Robert S. Raymar	SC	Yale	1972	2022	863.8	\$1,300	\$1,122,940
Robert S. Raymar	SC	Yale	1972	2023	1,110.4	\$1,380	\$1,532,352
Robert S. Raymar	SC	Yale	1972	1/24-3/24	204.3	\$1,390	\$283,977
David Copeland	C	Fordham	1985	2023	1,201.7	\$1,165	\$1,399,981
David Copeland	C	Fordham	1985	1/24-3/24	503.2	\$1,175	\$591,260
Bruce S. Eterman	C	University of Pennsylvania	1984	2022	299.5	\$1,100	\$329,450
Bruce S. Eterman	C	University of Pennsylvania	1984	2023	810.2	\$1,165	\$943,883
Matthew E. Moloshok	C	George Washington University	1977	2021	9.3	\$1,100	\$10,230
Matthew E. Moloshok	C	George Washington University	1977	2022	140.3	\$1,100	\$154,330
Matthew E. Moloshok	C	George Washington University	1977	2023	146.5	\$1,165	\$170,673

**Reported Total Hours and Historical Rate Lodestar  
Inception through March 2024**

<b>Name</b>	<b>Position</b>	<b>Law School</b>	<b>Bar Admission</b>	<b>Year</b>	<b>Hours</b>	<b>Rate</b>	<b>Lodestar</b>
Robert B. Rosen	C	University of Pennsylvania	1986	2021	41.4	\$1,100	\$45,540
Robert B. Rosen	C	University of Pennsylvania	1986	2022	283.0	\$1,100	\$311,300
Robert B. Rosen	C	University of Pennsylvania	1986	2023	288.9	\$1,165	\$336,569
Natasha Zaslove	SA	Hastings College of Law	1995	2023	649.0	\$840	\$545,160
Natasha Zaslove	SA	Hastings College of Law	1995	1/24-3/24	429.8	\$875	\$376,075
Alexis Marquez	SA	Fordham	2013	2022	321.7	\$700	\$225,190
Alexis Marquez	SA	Fordham	2013	2023	328.1	\$740	\$242,794
Sarah Schuster	SA	New York University	2015	2022	650.5	\$700	\$455,350
Sarah Schuster	SA	New York University	2015	2023	433.7	\$740	\$320,938
Steven Magnusson	SA	George Washington University	2017	2022	475.0	\$700	\$332,500
Steven Magnusson	SA	George Washington University	2017	2023	2,375.0	\$740	\$1,757,500
Steven Magnusson	SA	George Washington University	2017	1/24-3/24	830.8	\$770	\$639,716
Andrew Ellington	A	Vanderbilt University	2011	2023	834.9	\$650	\$542,685
Flor Melgar	DR	Hofstra University	1994	2023	2,172.0	\$450	\$977,400
Flor Melgar	DR	Hofstra University	1994	1/24-3/24	711.1	\$450	\$319,995
Maria Frantom	DR	Thomas M. Cooley	2010	2023	481.9	\$450	\$216,833

**Reported Total Hours and Historical Rate Lodestar  
Inception through March 2024**

Name	Position	Law School	Bar Admission	Year	Hours	Rate	Lodestar
Anna Sesay	DR	South Bank University, London	1998	2023	2,177.6	\$450	\$979,920
Anna Sesay	DR	South Bank University, London	1998	1/24-3/24	20.4	\$450	\$9,180
Irma Diane Bobb	DR	Loyola University, Louisiana	1999	2023	2,183.3	\$450	\$982,485
Irma Diane Bobb	DR	Loyola University, Louisiana	1999	1/24-3/24	748.0	\$450	\$336,600
Rina Niyogi	DR	Thomas M. Cooley	2002	2023	2,090.9	\$450	\$940,905
Rina Niyogi	DR	Thomas M. Cooley	2002	1/24 - 3/24	818.3	\$450	\$368,235
Lisa Uffman-Kirsch	DR	Case Western Reserve	2013	2023	1,212.8	\$450	\$545,760
Lisa Uffman-Kirsch	DR	Case Western Reserve	2013	1/24 - 3/24	574.7	\$450	\$258,615
Yusuf Naqvi	DR	University of Illinois, Chicago	2012	2023	1.5	\$450	\$675
Yusuf Naqvi	DR	University of Illinois, Chicago	2012	1/24 - 3/24	77.2	\$450	\$34,740
Alex Polley	DR	Washington University in St. Louis	2013	2023	40.4	\$450	\$18,180
Alex Polley	DR	Washington University in St. Louis	2013	1/24 - 3/24	645.1	\$450	\$290,295
Jordan Wolff	DR	University of Georgia	2006	2023	19.5	\$450	\$8,775
Jordan Wolff	DR	University of Georgia	2006	1/24 - 3/24	564.5	\$450	\$254,025
Julian Caprow	PL			2022	20.6	\$300	\$6,180
Julian Caprow	PL			2023	36.3	\$325	\$11,798
Julian Caprow	PL			1/24 - 3/24	13.2	\$340	\$4,488
<b>TOTAL</b>					<b>36,232.3</b>		<b>\$31,368,140</b>

**Reported Total Hours and Blended Rate Lodestar  
Inception through March 2024**

Name	Position	Law School	Bar Admission	Total Hours	Blended Rate	Lodestar
Robert D. Gilbert	MP	Yale	1982	6,961.2	\$1,444	\$10,054,639
Elpidio Villarreal	P	Yale	1985	1,375.6	\$1,458	\$2,006,266
Robert S. Raymar	SC	Yale	1972	2,233.7	\$1,348	\$3,011,029
David Copeland	C	Fordham	1985	1,704.9	\$1,168	\$1,991,241
Bruce S. Etterman	C	University of Pennsylvania	1984	1,109.7	\$1,147	\$1,273,333
Matthew E. Moloshok	C	George Washington University	1977	296.1	\$1,132	\$335,233
Robert B. Rosen	C	University of Pennsylvania	1986	613.3	\$1,131	\$693,409
Natasha Zaslove	SA	Hastings College of Law	1995	1,078.8	\$854	\$921,235
Alexis Marquez	SA	Fordham	2013	649.8	\$720	\$467,984
Sarah Schuster	SA	New York University	2015	1,084.2	\$716	\$776,288
Steven Magnusson	SA	George Washington University	2017	3,680.8	\$742	\$2,729,716
Andrew Ellington	A	Vanderbilt University	2011	834.9	\$650	\$542,685
Flor Melgar	DR	Hofstra University	1994	2,883.1	\$450	\$1,297,395
Maria Frantom	DR	Thomas M. Cooley	2010	481.9	\$450	\$216,833
Anna Sesay	DR	South Bank University, London	1998	2,198.0	\$450	\$989,100
Irma Diane Bobb	DR	Loyola University, Louisiana	1999	2,931.3	\$450	\$1,319,085
Rina Niyogi	DR	Thomas M. Cooley	2002	2,909.2	\$450	\$1,309,140
Lisa Uffman-Kirsch	DR	Case Western Reserve	2013	1,787.5	\$450	\$804,375
Yusuf Naqvi	DR	University of Illinois, Chicago	2012	78.7	\$450	\$35,415
Alex Polley	DR	Washington University in St. Louis	2013	685.5	\$450	\$308,475
Jordan Wolff	DR	University of Georgia	2006	584.0	\$450	\$262,800
Julian Caprow	PL			70.1	\$320	\$22,466
<b>TOTAL</b>				<b>36,232.3</b>		<b>\$31,368,140</b>

**Reported Total Hours and Blended Rate Lodestar  
Inception through March 2024**

**Role Legend**

MP	Managing Partner
P	Partner
SC	Special Counsel
C	Counsel
SA	Senior Associate
A	Associate
DR	Document Review Attorney
PL	Paralegal



# **EXHIBIT B**

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS**

ANDREW CORZO, SIA HENRY, ALEXANDER LEO-  
GUERRA, MICHAEL MAERLENDER, BRANDON  
PIYEVSKY, BENJAMIN SHUMATE, BRITTANY  
TATIANA WEAVER, and CAMERON WILLIAMS,  
individually and on behalf of all others similarly situated,

Plaintiffs,

v.

BROWN UNIVERSITY, CALIFORNIA INSTITUTE OF  
TECHNOLOGY, UNIVERSITY OF CHICAGO, THE  
TRUSTEES OF COLUMBIA UNIVERSITY IN THE CITY  
OF NEW YORK, CORNELL UNIVERSITY, TRUSTEES  
OF DARTMOUTH COLLEGE, DUKE UNIVERSITY,  
EMORY UNIVERSITY, GEORGETOWN UNIVERSITY,  
THE JOHNS HOPKINS UNIVERSITY,  
MASSACHUSETTS INSTITUTE OF TECHNOLOGY,  
NORTHWESTERN UNIVERSITY, UNIVERSITY OF  
NOTRE DAME DU LAC, THE TRUSTEES OF THE  
UNIVERSITY OF PENNSYLVANIA, WILLIAM MARSH  
RICE UNIVERSITY, VANDERBILT UNIVERSITY, and  
YALE UNIVERSITY,

Defendants.

**Case No. 1:22-cv-00125**

**Hon. Matthew F. Kennelly**

**EXHIBIT B TO THE DECLARATION OF ROBERT D. GILBERT IN SUPPORT OF  
PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND  
LITIGATION EXPENSES**

**Reported Expenses on Behalf of Plaintiffs  
Inception through March 31, 2024**

Litigation Fund Contributions	\$834,000
Photocopying	\$4,583
Service of Process	\$564
Computer Research	\$43,715
Court Fees (filings, etc.)	\$588
Court Reporters (Transcripts)	\$468
Telephone/Fax	\$115
Postage	\$255
Travel: Air Transportation, Ground Travels, Meals, Lodging	\$95,852
Outside Contractor	\$27,528
<b>Total</b>	<b>\$1,007,668</b>